

DOA: 3/15/2025

UNITED STATES DISTRICT COURT***DISTRICT OF ARIZONA***

United States of America

Case No.: 25-6125MJ

v.

CRIMINAL COMPLAINT

1. Alejandro Rodriguez, and

2. Maricruz Carrillo.

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

COUNT 1

On or about March 15, 2025, in the County of Maricopa in the District of Arizona, the Defendant ALEJANDRO RODRIGUEZ knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess firearms and ammunition, that is, (1) Norinco 7.62 x 39 mm caliber rifle, serial# T15009197; (2) Colt, .45 ACP caliber pistol, serial# XED6391; (3) FN, Model SCAR-15P, 5.56 x 45 mm caliber pistol, serial# SCP02486; (4) Colt pistol serial# GV050725; (5) Staccato, Model C2, 9 x 19 mm caliber pistol, serial# TX27669; (6) PSA 9 x 19 mm caliber pistol, serial# AKV011440; (7) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7158948; (8) CAI, model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159522; (9) CAI, model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7158867; (10) CAI, model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159432; (11) FN, Model 249S, 5.56 x 45 mm caliber rifle, serial# M249SA10935; (12) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159412; (13) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159419; (14) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159024; (15) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159060; (16) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159506; (17) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159401; (18) Norinco, Model MAK90, 7.62 x 39 mm caliber rifle, serial# 9438245; (19) Barrett, Model M82A1, .50 BMG caliber rifle, serial# AA009923; (20) Colt, .38 Super Auto caliber pistol, serial# GV068788; (21) Colt, .38 Super Auto caliber pistol, serial#

GV068782; and (22) numerous cases of ammunition manufactured by Tela Ammo, said firearms and ammunition having shipped and transported in interstate and foreign commerce.

COUNT 2

On or about March 15, 2025, in the County of Maricopa in the District of Arizona, the defendant, MARICRUZ CARRILLO, knowing that she had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess firearms and ammunition, that is, (1) Norinco 7.62 x 39 mm caliber rifle, serial# T15009197; (2) Colt, .45 ACP caliber pistol, serial# XED6391; (3) FN, Model SCAR-15P, 5.56 x 45 mm caliber pistol, serial# SCP02486; (4) Colt pistol serial# GV050725; (5) Staccato, Model C2, 9 x 19 mm caliber pistol, serial# TX27669; (6) PSA 9 x 19 mm caliber pistol, serial# AKV011440; (7) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7158948; (8) CAI, model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159522; (9) CAI, model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7158867; (10) CAI, model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159432; (11) FN, Model 249S, 5.56 x 45 mm caliber rifle, serial# M249SA10935; (12) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159412; (13) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159419; (14) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159024; (15) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159060; (16) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159506; (17) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159401; (18) Norinco, Model MAK90, 7.62 x 39 mm caliber rifle, serial# 9438245; (19) Barrett, Model M82A1, .50 BMG caliber rifle, serial# AA009923; (20) Colt, .38 Super Auto caliber pistol, serial# GV068788; (21) Colt, .38 Super Auto caliber pistol, serial# GV068782; and (22) numerous cases of ammunition manufactured by Tela Ammo, said firearms and ammunition having shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

I further state that I am a Senior Special Agent from the Bureau of Alcohol, Tobacco, Firearms & Explosives and that this complaint is based on the following facts:

See Attached Statement of Probable Cause Incorporated By Reference Herein.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

AUTHORIZED BY: Maria R. Gutierrez, AUSA

SSA, Lowell I. Farley, Jr.

Name of Complainant

LOWELL
FARLEY

Digitally signed by LOWELL FARLEY
Date: 2025.03.16 10:25:03 -0700

Signature of Complainant

Sworn to me telephonically and subscribed electronically.

March 16, 2025@10:50am

Date

at

Phoenix, Arizona

City and State

HONORABLE ALISON S. BACHUS

United States Magistrate Judge

Name & Title of Judicial Officer



Signature of Judicial Officer

STATEMENT OF PROBABLE CAUSE

I, Lowell I. Farley, Jr., a Senior Special Agent of the Bureau of Alcohol, Tobacco, Firearms & Explosives, United States Department of Justice, being duly sworn, does depose and state the following:

INTRODUCTION AND BACKGROUND OF AFFIANT

1. I am a Senior Special Agent (SSA) with the Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF) and have been so employed since March 2005. I am currently assigned to the ATF Phoenix Field Division, Phoenix Group I Field Office. As an ATF SSA, I am authorized to investigate violations of the laws of the United States and am a law enforcement officer within the meaning of 18 U.S.C. § 2510(7). Prior to becoming an ATF SSA, I was employed by Nippon Telephone & Telegraph (NTT) as a systems engineer. Prior to my employment with NTT, I was employed by Motorola as a software engineer.

2. I am a graduate of the University of Florida in Gainesville, Florida. I possess Bachelor of Science and Master of Science degrees in Decision & Information Sciences. I am a graduate of the Criminal Investigator Training Program (CITP) at the Federal Law Enforcement Training Center (FLETC) in Glynco (Brunswick), Georgia. I am also a graduate of the ATF Special Agent Basic Training (SABT) program at the ATF National Academy in Glynco, Georgia. Based on my training, knowledge, and experience, I regularly conduct federal criminal investigations of offenses enumerated in Title 18, Title 21, and Title 26 of the United States Code (U.S.C.).

3. I specifically possess knowledge, training, and experience in investigating violations of statutes enacted in the Gun Control Act of 1968 (GCA), Title 18, U.S.C., Chapter 44 and of statutes enacted in the National Firearms Act of 1934 (NFA), Title 26, U.S.C., Chapter 53. I have attended specialized training provided by ATF in the identification and classification of firearms and determining whether a firearm and/or ammunition has moved in and/or otherwise affected interstate commerce. I am a recognized interstate nexus expert in the United States District Court for the District of Arizona and for the Southern District of Texas.

4. During my 20 years as a federal law enforcement officer, I have acquired extensive experience in conducting physical surveillance, interviewing witnesses, writing affidavits for warrants, and executing warrants for arrests and searches. I routinely access multiple databases and intelligence-based systems throughout my investigations and have participated in numerous interagency and international investigations.

5. The facts in this affidavit come from my personal observations, my training and experience, information obtained from other agents involved in the investigation, and information obtained from witnesses.

6. Based on the below facts, I submit there is probable cause that ALEJANDRO RODRIGUEZ and MARICRUZ CARRILLO, violated 18, U.S.C. §§ 922(g)(1) and 924(a)(8), felon in possession of firearms and ammunition.

7. Because this Affidavit is being submitted for the limited purpose of establishing probable cause for the requested warrant, I have not set forth all of the relevant facts known to law enforcement officers.

PROBABLE CAUSE

8. On March 13, 2025, at approximately 2:28 p.m., law enforcement observed

a dark in gray Jeep Gladiator arrive at a residence on Ardmore Road in Phoenix (“Ardmore Road residence”). The Jeep Gladiator backed into the driveway. The Jeep Gladiator had multiple boxes that filled the bed of the vehicle and appear to be weighing the vehicle down. An unknown individual (“UI 1”) exited the driver seat of the Jeep Gladiator and began to speak with RODRIGUEZ briefly before the two begin to offload the boxes. The boxes appear to be consistent in size with boxes commonly used to package and ship ammunition.

9. After UI 1 and RODRIGUEZ finished unloading the boxes from the bed of the Jeep Gladiator, law enforcement could see that the vehicle has risen in height, as though the boxes were heavy. The number of boxes appeared to be consistent with a pallet size shipment of ammunition. RODRIGUEZ is then seen moving the boxes from his driveway into the garage of the Ardmore Road residence.

10. On March 14, 2025, at approximately 6:35 p.m., a vehicle parks in the driveway of the Ardmore Road residence. RODRIGUEZ exits from the front passenger seat and enters the residence with the female driver who is later identified as CARILLO. Approximately three minutes later, RODRIGUEZ exits the Ardmore Road residence with CARILLO and walks towards the rear of the vehicle. As RODRIGUEZ opened the hatch to the cargo compartment, multiple boxes consistent with the shipping and packaging of AK47 or AR15 style firearms were seen by law enforcement. RODRIGUEZ and CARILLO begin to remove the boxes from the vehicle and taking them into the residence. I estimated approximately 8-10 boxes were taken into the residence.

11. At approximately 6:56 p.m., RODRIGUEZ exits the residence carrying

several boxes, consistent with the shipping and packaging of AK47 or AR15 style firearms, to the rear cargo compartment of the vehicle. I estimated six boxes were placed into the rear cargo compartment of the vehicle. CARILLO then got into the driver seat of vehicle as RODRIGUEZ got into the front passenger seat and were observed driving away from the Ardmore Road residence.

Execution of Search Warrant at the Ardmore Road Residence

12. On March 15, 2025, an ATF Task Force Officer (TFO) assigned to ATF Phoenix Group I obtained Maricopa County Search Warrant SW# 2025-07846 for the Ardmore Road residence. Agents executed the search warrant and found the following: (1) Norinco 7.62 x 39 mm caliber rifle, serial# T15009197; (2) Colt, .45 ACP caliber pistol, serial# XED6391; (3) FN, Model SCAR-15P, 5.56 x 45 mm caliber pistol, serial# SCP02486; (4) Colt pistol serial# GV050725; (5) Staccato, Model C2, 9 x 19 mm caliber pistol, serial# TX27669; (6) PSA 9 x 19 mm caliber pistol, serial# AKV011440; (7) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7158948; (8) CAI, model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159522; (9) CAI, model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7158867; (10) CAI, model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159432; (11) FN, Model 249S, 5.56 x 45 mm caliber rifle, serial# M249SA10935; (12) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159412; (13) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159419; (14) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159024; (15) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159060; (16) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159506; (17) CAI, Model VSKA, 7.62 x 39 mm caliber rifle, serial# SV7159401; (18) Norinco, Model MAK90, 7.62 x 39 mm caliber rifle, serial# 9438245; (19) Barrett, Model M82A1, .50 BMG caliber rifle, serial# AA009923; (20) Colt, .38 Super Auto

caliber pistol, serial# GV068788; (21) Colt, .38 Super Auto caliber pistol, serial# GV068782; and (22) numerous cases of ammunition manufactured by Tela Ammo. The firearms and ammunition were found throughout the entire residence, including the master bedroom and closet, front room, garage, and other bedrooms in the residence. RODRIGUEZ, CARRILLO, another adult, and three minor children live at the Ardmore Road residence. RODRIGUEZ and CARRILLO occupy the master bedroom.

13. Post-*Miranda*, RODRIGUEZ advised he knew he was convicted of a felony and that he has not had his right to possess firearms restored. RODRIGUEZ then advised he did not want to answer any more questions. RODRIGUEZ later requested to speak with an attorney.

14. Post-*Miranda*, CARRILLO stated that she knew she had been convicted of a felony and that she has not had her right to possess firearms restored. CARRILLO further stated she has handled the firearms and ammunition and that her DNA and/or fingerprints would be on the firearms and ammunition because she has handled them prior to the arrival of law enforcement.

Criminal Histories

15. RODRIGUEZ was convicted of possession of narcotics drugs transport and/or sell, a Class 2 felony, and possession/use of a weapon in a drug offense, a Class 4 felony, in Maricopa County Superior Court (CR2020-104416-001). RODRIGUEZ was sentenced to a term of imprisonment and probation.

16. CARRILLO was convicted of possession of narcotics drugs transport and/or sell, a Class 2 felony, and misconduct of weapons, a Class 4 felony, in Maricopa County

Superior Court (CR-2020-104416-002). CARRILLO was sentenced to 365 days of imprisonment and probation.

Interstate Nexus

17. The firearms and ammunition seized from the Ardmore Road residence were not manufactured in Arizona; therefore, the firearms and ammunition were shipped in interstate and foreign commerce.

18. Based on the above stated facts, I submit that there is probable cause to believe that the defendants, RODRIGUEZ and CARILLO violated the offenses as alleged in the Complaint.

LOWELL FARLEY
Digitally signed by
LOWELL FARLEY
Date: 2025.03.16
10:25:39 -0700

Lowell I. Farley, Jr.
Senior Special Agent
Bureau of Alcohol, Tobacco, Firearms &
Explosives

Telephonically sworn to and subscribed this 16th day of March, 2025.



HONORABLE ALISON S. BACHUS
United States Magistrate Judge